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 CITY OF OAKLAND, et al.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANITA MIRALLE, JODII LE'GRAND	)	Case No. 4:18-cv-06823-HSG
EVERETT, I, TINA SCOTT, AIYAHNNA	)	
JOHNSON; IRVIN JOSUE	)	<b>STIPULATION AND ORDER TO</b>
HERNANDEZ ORTEGA; and AYAT	)	<b>CONTINUE CASE</b>
JALAL,	)	<b>MANAGEMENT DEADLINES</b>
	)	
Plaintiff,	)	
	)	<b>Case Filed:</b> November 9, 2018
vs.	)	
	)	<b>Hon. Haywood S. Gilliam, Jr.</b>
CITY OF OAKLAND, a subdivision of	)	
the State of California; LIBBY SCHAAF;	)	
JOE DEVRIES; SUSAN MANHEIMER;	)	
and EDWARD REISKIN,	)	
	)	
Defendants.	)	

1 On May 8, 2020, the Court granted the parties' stipulation to continue the  
2 remaining case management deadlines. (ECF No. 98.) Since the Court's order, the  
3 parties have been working diligently towards settlement, including participating two  
4 settlement conferences with Judge Spero and meeting and conferring with counsel  
5 between those conferences in order to further settlement discussions. The parties are  
6 currently scheduled to meet and confer three times to advance settlement discussions  
7 between the filing of this stipulation and the upcoming October 15, 2020 settlement  
8 conference scheduled by Judge Spero. The parties are optimistic, although not certain,  
9 that settlement will be achievable. Meanwhile, the current case management schedule  
10 will have the parties exchanging expert reports on September 9, 2020. With the parties  
11 working towards settlement, they seek to avoid the potentially unnecessary expense of  
12 experts, and they wish to maintain focus on settlement at this time.

13 In an effort to give the settlement process its full value, the parties seek to  
14 suspend the current case management deadlines and reset them if there is a breakdown  
15 of settlement. Therefore, the parties stipulate and respectfully request that the Court  
16 suspend the current case management deadlines and set a date of October 19, 2020, for  
17 the parties to provide the Court a joint status report. In the joint status report, the  
18 parties will inform the Court whether the case has settled or whether settlement  
19 discussions remain fruitful and whether the parties continue to make progress. If  
20 settlement discussions break down, the parties propose that the case management  
21 deadlines be reinstated, set 60 days out from the date settlement breaks down. This  
22 proposal balances allowing the parties to focus on settlement talks while also ensuring  
23 that, if such talks break down, the parties resume an expeditious non-settlement  
24 litigation schedule.

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1 Dated: September 6, 2020

2 SIEGEL, YEE, BRUNNER & MEHTA

3 By /s/ EmilyRose Johns

4 EmilyRose Johns

5 Attorneys for Plaintiff  
6 ANITA MIRALLE, JODII LE'GRAND  
7 EVERETT, I, TINA SCOTT,  
8 AIYAHNNA JOHNSON,  
9 IRVIN JOSUE HERNANDEZ ORTEGA,  
and AYAT JALAL

10 Date: September 6, 2020

11 BARBARA J. PARKER, City Attorney  
12 MARIA BEE, Chief Assistant City Attorney  
13 DAVID A. PEREDA, Special Counsel  
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15 By: /s/ Zoe Savitsky

16 Zoe Savitsky

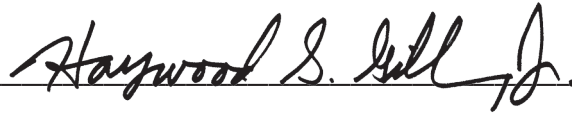
17 Attorneys for Defendants,  
18 CITY OF OAKLAND, et al.

**ORDER**

IT IS HEREBY ORDERED that, pursuant to the stipulation of the parties, which is recited above, and good cause in support thereof, that the case management deadlines are suspended and the parties will supply the Court with a joint status report on October 19, 2020. Should settlement talks break down, the Court will reinstate the case management schedule, set 60 days out from the date of the breakdown of settlement.

IT IS SO ORDERED.

Dated: September 8, 2020

A handwritten signature in black ink, reading "Haywood S. Gilliam, Jr.", is written over a horizontal line.

Hon. Haywood S. Gilliam, Jr.  
UNITED STATES DISTRICT COURT JUDGE